

United States Environmental Protection Agency Region I - New England 5 Post Office Square, Suite 100 Boston, Massachusetts 02109-3912

AUG - 3 2011

Chris Braga, Production Manager Promet Marine Services Corporation 242 Allens Avenue Providence, RI 02905

Re:

June 7, 2011, Inspection

Dear Mr. Braga:

As you know, on June 7, 2011, the U.S. Environmental Protection Agency ("the EPA") conducted an inspection at your facility located at 242 Allens Avenue, Providence, Rhode Island. The EPA would like to thank you and your staff for your assistance.

The purpose of the inspection is to review Promet's fuel-oil storage systems under the EPA's Oil Pollution Prevention Regulations at 40 C.F.R. Part 112, and industrial process wastewater discharges under EPA's National Pollutant Discharge Elimination Systems ("NPDES") Regulations at 40 C.F.R. Part 122.

EPA reviewed Promet's June 1, 2006, Spill Prevention, Control and Countermeasures ("SPCC") Plan. Briefly, Promet's SPCC Plan is incomplete. Please note that your SPCC Plan is due for its five year review, see 40 C.F.R. §112.5(b). During the inspection, EPA provided you with certain recommendations to improve Promet's fuel-oil storage systems. In accordance with 40 C.F.R. §112.5(b), you must amend your SPCC Plan within six months of the review to include more effective prevention and control technology ... to reduce the likelihood of a discharge as described in §112.1(b).

Process wastewaters from pressure boat bottom and vessel hull washing operations are collected and reused by way of a recycle system. Promet should evaluate the potential to redirecting these wastewaters to the municipal sanitary sewer system. According to a Promet representative, pressure washing operations are only conducted during dry weather conditions. Following pressure washing operations, the area of operation is cleaned and sweep. Promet shall maintain tank pumping records for its recycle system and operational logs recording date and period of time the system is in operation.

During the site walk, EPA provided stormwater Best Management Practice ("BMP") recommendations to improve the quality of stormwaters. Recommendations included stabilizing a stormwater drainage trench and establish a vegetated set back from the trench. The trench conveys stormwaters from the facility to an outfall. The EPA also recommends you consider a stormwater plunge-pool or settling basin be installed prior to the outfall.

Within 30-days of receiving this letter, the EPA is requesting a response to this letter. Please indicate what has been done, or what will be done, regarding certain issues identified in this letter. If necessary, please also provide a detailed construction schedule indicating when certain items and/or improvements will be achieved. The EPA is in receipt of your June 30, 2011, and July 12, 2011, correspondence which include certain corrective actions and improvements to EPA's inspection.

The EPA is providing you with a copy of all photos taken during the inspection. Additional comments are provided within the photos. If you have any questions regarding the information in this letter, you may reach me at (617) 918-1763 or e-mail me at "canzano.joseph@epa.gov.

Sincerely,

Joseph Canzano, P.E.

Regional SPCC Compliance Coordinator
Office of Environmental Stewardship

cc: David Chopy, RIDES

Jim Ball, RIDES Hugh Pilgrim, EPA Dave Turin, EPA





































































































